REMARKS

Claims 1-10 are pending and under consideration. Reconsideration is respectfully requested.

In the Office Action, starting on page 3, numbered paragraph 6, claims 1-10 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Japanese Patent Number 08-137508 issued to Kajiwara in view of U.S. Patent Number 5,018,202 issued to Takahashi. The rejection of these claims is traversed below and reconsideration is respectfully requested.

Claims 1-8 each recites a "transfer function (or functions) assumed in advance" that accepts "acquired time series data of manipulated variables" as input and outputs "time series data of values" (e.g., claim 1, lines 5-7). As acknowledged by the Office Action on page 3, Kajiwara does not teach or suggest a "transfer function (or functions) assumed in advance" as recited in the claims, but rather relied on Takahashi to teach this feature.

Takahashi is directed to an "electronic noise attenuation system" which attenuates "a sound wave propagated from a source of noise by generating another sound wave 180 degree[s] out of phase and having the same sound pressure with the propagated sound wave" (Abstract, lines 1-5). As illustrated in Figs. 1, 4, 7 and 8, the electronic noise attenuation system of Takahashi includes a speaker (reference character S) producing output based on the detected sound from two microphones (reference characters M1 and M2), but does not include a memory to store data gathered from the microphones. Thus, given the response time necessary to attenuate "a sound wave propagat[ing] from a source of noise" and the absence of data storage in the system configurations shown Figs. 1, 4, 7 and 8, one of ordinary skill in the art would understand Takahashi as a disclosing real-time or quasi real-time system.

Furthermore, in the system configurations of Figs. 1, 4, 7 and 8, Takahashi teaches a transfer function (reference character D) that accepts real-time input from microphones M1 and M2 and outputs a filter coefficient (see, e.g., column 7, lines 8-14). Since Takahashi used the term "filter coefficient" and not "filter coefficients" and nothing has been cited in Takahashi that suggests a filter coefficient is a series of values, one of ordinary skill in the are would understand the transfer function described by Takahashi as producing a single value (the filter coefficient) as output in real-time. Consequently, Takahashi teaches a transfer function that responds to input to produce a filter coefficient in real-time, and does not accept "acquired time

series data of manipulated variables" as input or output "time series data of values" as recited in independent claims 1-8 (*e.g.*, claim 1, lines 5-7).

In addition, since Kajiwara was alleged by the Office Action to teach "time-series data" as recited in the claims and Takahashi teaches a transfer function that operates in real-time inputs and outputs, there is no discussion in the Office Action that cites how the system of Kajiwara would be modify by the teaching of Takahashi. No evidence was presented in the Office Action that suggests one of ordinary skill in the art would be able to use the transfer function taught by Takahashi, which operates on real-time data, as a component in the system of Kajiwara, which the Office Action alleged used "time-series data".

Therefore, it is submitted that claims 1-8 are patentably distinguishable over Kajiwara and Takahashi, alone or in combination.

Claim 9 recites "generating a controlled-object model … from a transfer function determined prior to said generating and optimum parameters derived from the controlled variables and at least one error in an output of the transfer function" at lines 3-6. As discussed above, the transfer function described by Takahashi outputs a filter coefficient and nothing has been cited in either Takahashi or Kajiwara that suggests a filter coefficient is comparable to "a controlled-object model" that is "generat[ed] … from a transfer function … and at least one error in an output of the transfer function" as recited in claim 9. Therefore, it is submitted that claim 9 as well as claim 10, which depends therefrom, are patentably distinguishable over Kajiwara and Takahashi, alone or in combination.

In accordance with the foregoing, it is respectfully submitted that all outstanding objections and rejections have been overcome and/or rendered moot. And further, that all pending claims patentably distinguish over the prior art. Thus, there being no further outstanding objections or rejections, the application is submitted as being in condition for allowance which action is earnestly solicited.

If the Examiner has any remaining issues to be addressed, it is believed that prosecution can be expedited by the Examiner contacting the undersigned attorney for a telephone interview to discuss resolution of such issues.

If there are any underpayments or overpayments of fees associated with the filing of this Amendment, please charge and/or credit the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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